

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

BOUNTS TECHNOLOGIES LTD.,

Plaintiff,

v.

CONNECTIFY, INC. AND DOES 1-100,

Defendants.

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CASE NO. 2:23-cv-890

Judge Mia Roberts Perez

PROPOSED SCHEDULING ORDER

In accordance with the Court's August 5, 2025 Scheduling Order (ECF Doc. No. 55), the Parties have conferred and hereby submit the following Proposed Scheduling Order:

| Proposed Date | Event |
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| October 19-30, 2026 | Jury Selection/Trial. |
| To be determined by the Court | Final Pretrial Conference. [The Court expects to set this date at the conclusion of the <i>Markman</i> Hearing]. |
| 3 business days before pretrial conference | File joint notice identifying remaining objections to pretrial disclosures and disputes on motions <i>in limine</i> . |
| October 12, 2026 | Deadline to meet and confer regarding remaining objections and disputes on motions <i>in limine</i> . |
| October 5, 2026 | File Joint Pretrial Order and Pretrial Submissions (jury instructions, exhibits lists, witness lists, discovery and deposition designations); file oppositions to motions <i>in limine</i> . |
| September 28, 2026 | Serve objections to rebuttal disclosures and file Motions <i>in limine</i> . |
| September 21, 2026 | Serve objections to pretrial disclosures/rebuttal disclosures. |

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| September 14, 2026 | Serve Pretrial Disclosures (jury instructions, exhibits lists, witness lists, discovery and deposition designations). |
| September 14, 2026 | File reply in further support of dispositive motions and <i>Daubert</i> motions. |
| September 7, 2026 | Parties file Joint Report regarding results of meet and confer. |
| August 31, 2026 | Deadline to meet and confer to discuss narrowing the number of claims asserted and prior art references at issue. The parties shall file a Joint Report within 5 business days regarding the results of the meet and confer. |
| August 17, 2026 | File oppositions to dispositive motions and <i>Daubert</i> motions (if any). |
| July 27, 2026 | Dispositive motion deadline and <i>Daubert</i> motion deadline. |
| July 15, 2026 | Close of expert discovery (including depositions). |
| June 15, 2026 | Serve rebuttal expert reports. |
| June 1, 2026 | Serve responsive expert reports. |
| April 30, 2026 | Serve opening expert reports for Party bearing burden of proof. |
| April 20, 2026 | Close of fact discovery. |
| April 13, 2026 | Deadline to amend pleadings. A motion is not required unless the amendment adds patents or patent claims. |
| March 16, 2026 | Deadline to serve Final Infringement and Invalidity Contentions. After this date, leave of Court is required for any amendment to Infringement or Invalidity contentions. This deadline does not relieve the Parties of their obligation to seasonably amend if new information is identified after initial contentions. |
| March 2, 2026 | Deadline to add parties. |

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| February 20, 2026 | <p>Deadline to substantially complete document production and exchange privilege logs.</p> <p>Counsel are expected to make good faith efforts to produce all required documents as soon as they are available and not wait until the substantial completion deadline.</p> |
| February 6, 2026 (or as soon as practicable) | Markman Hearing. |
| January 12, 2026 | Parties submit Joint Claim Construction Statement. In addition to filing, the parties shall jointly submit, via USB drive, Dropbox (not another cloud storage), or email to the law clerk, pdf versions of all as-filed briefing and exhibits. Absent agreement of the parties, the Plaintiff shall be responsible for the timely submission of this and other Joint filings. |
| January 5, 2026 | Parties file Reply claim construction briefs. |
| December 19, 2025 | Parties file Responsive claim construction briefs. |
| November 28, 2025 | Parties file Opening claim construction briefs, including any arguments that any claim terms are indefinite. |
| November 21, 2025 | Deadline to meet and confer to narrow terms in dispute and exchange revised list of terms/constructions. |
| November 14, 2025 | <p>Parties disclose extrinsic evidence for the Markman Hearing. The parties shall disclose any extrinsic evidence, including the identity of any expert witness they may rely upon with respect to claim construction or indefiniteness. With respect to any expert identified, the parties shall also provide a summary of the witness's expected testimony including the opinions to be expressed and a general description of the basis and reasons therefor.</p> <p>A failure to summarize the potential expert testimony in a good faith, informative fashion may result in the exclusion of the proffered testimony. With respect to items of extrinsic evidence, the parties shall identify each such item by production number or produce a copy of any such item if not previously produced.</p> |
| October 20, 2025 | Parties exchange proposed claim constructions. |

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| October 6, 2025 | Parties exchange claim terms for construction. |
| September 22, 2025 | <p>Defendant serves preliminary invalidity contentions in the form of (1) a chart setting forth where in the prior art references each element of the asserted claim(s) are found, (2) an identification of any limitations the Defendant contends are indefinite or lack written description under section 112, and (3) an identification of any claims the Defendant contends are directed to ineligible subject matter under section 101.</p> <p>Defendant shall also produce (1) all prior art referenced in the invalidity contentions, (2) technical documents, including software where applicable, sufficient to show the operation of the accused product(s), and (3) summary, annual sales information for the accused product(s) for the two years preceding the filing of the Complaint, unless the parties agree to some other timeframe.</p> |
| September 9, 2025 | File Proposed Protective Order |
| September 9, 2025 | Plaintiff serves preliminary infringement contentions in the form of a chart setting forth where in the accused product(s) each element of the asserted claim(s) are found. Plaintiff shall also identify the earliest priority date (<i>i.e.</i> the earliest date of invention) for each asserted claim and produce: (1) all documents evidencing conception and reduction to practice for each claimed invention, and (2) a copy of the file history for each patent in suit. |
| September 2, 2025 | File Proposed Scheduling Order. |
| September 2, 2025 | Comply with Rule 26(a)'s duty of self-executing disclosures. |

SO ORDERED this _____ day of _____, 2025.

BY THE COURT:

Hon. Mia Roberts Perez
United States District Judge